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17 **UNITED STATES DISTRICT COURT**
18 **DISTRICT OF NEVADA**

19 Betty Williamson,
20 Plaintiff,
21 vs.
22 Richland Holdings Inc., dba Acctcorp
23 of Southern Nevada, and Law Offices
24 of Donna Armenta,
25 Defendant.

Case No.: 2:19-cv-01679-RFB-VCF

**Stipulation to extend the discovery
schedule and the pretrial deadlines
by 120 days**

(First Request)

1 Plaintiff Betty Williamson (“Plaintiff”) and Defendants Richland Holdings
2 Inc., dba Acctcorp of Southern Nevada, and Donna Armenta Law, erroneously
3 named as “Law Offices of Donna Armenta” (referred collectively as “Defendants,”
4 and with Plaintiff, the “Parties”), by and through their respective counsel, hereby
5 submit this stipulation to modify the discovery schedule [ECF No. 12] and extend
6 only the deadlines set forth below by 120 days or until the stay is granted,
7 whichever comes first.

8 To be clear, the Parties contemplate that if the Court enters an Order on this
9 Stipulation, the deadlines will be extended as set forth herein. If the District Judge
10 grants AcctCorp’s Motion to Stay in the interim, then the new deadlines adopted
11 pursuant to this Stipulation will be stayed as a result. Once the stay is ultimately
12 lifted, the Parties will, within two weeks therefrom, submit a new joint proposed
13 discovery plan and scheduling order. If the Motion to Stay is denied, the Order on
14 this stipulation will govern all remaining deadlines set forth herein.

15 In light of the recent global health pandemic caused by Covid-19 and
16 Defendants’ pending non-opposed motion for stay, the Parties have stipulated to
17 extend the discovery schedule and extend the pretrial deadlines by 120 days or until
18 the stay is granted, whichever comes first. When Covid-19 began disrupting
19 businesses, litigation, and human life, Defendants moved to stay the proceeding in
20 light of the uncertainty and health crisis. ECF 18. Plaintiff filed a non-opposition
21 on April 8, 2020. ECF 19. As of the date of this stipulation, a ruling on the motion
22 to stay is still pending.

23 The Parties have agreed to continue dates to avoid the Parties being
24 prejudiced and to conserve their respective resources, as well as the Court’s time
25 and resources on this matter, as the Parties await a ruling on the motion to stay.
26 Granting an extension will not prejudice the Parties, the litigation, or the Court, but
27 in fact the extensions would avoid prejudice to any of the Parties there is a ruling on
28 the pending motion.

1 Proposed Schedule

2 • the last date to complete discovery from May 25, 2020, to
3 **September 22, 2020**;
4 • the last date to file dispositive motions from June 24, 2020, to
5 **October 22, 2020**;
6 • deadline for Defendants to respond to Plaintiff's discovery requests
7 from April 13, 2020, to **August 11, 2020**; and
8 • the last date to submit pretrial order and pretrial disclosures from July
9 24, 2020 to **November 23, 2020**.

10 Good cause exists to amend the Scheduling Order. The parties have been
11 diligent in light of the difficulties Covid-19 has brought upon. The Parties jointly
12 request that this Court modify the Scheduling Order to provide an additional time to
13 complete discovery, and in the ordinary course file dispositive motions, and the
14 pretrial documents as described in the proposed timeline above.

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1 This is the first request for an extension of this deadline, and it is sought in
2 good faith and not for the purposes of delay.
3 DATED this 25th day of June 2020.

4 **KAZEROUNI LAW GROUP, APC**

6 By: /s/ Gustavo Ponce

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19 *Donna Armenta Law*

22 **ORDER**

23 IT IS SO ORDERED.



26 United States Magistrate Judge

27 6-25-2020

28 DATED: _____

CERTIFICATION OF SERVICE

2 I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil
3 Procedure that on June 25, 2020, the foregoing Notice was served via CM/ECF to
4 all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Gustavo Ponce

Gustavo Ponce, Esq.

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